

Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARK OWEN and JAMES WANDLING,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiffs,

-against-

ELASTOS FOUNDATION, FENG HAN,
and RONG CHEN,

Defendants.

No. 1:19-cv-5462-GHW

**DEFENDANTS' INITIAL DISCLOSURE STATEMENT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, and the Initial Conference Order so ordered by this Court on January 2, 2022, Defendants Elastos Foundation, Feng Han, and Rong Chen (collectively, "Defendants"), provide the following initial disclosures to Mark Owen and James Wandling ("Plaintiffs").

GENERAL OBJECTIONS AND LIMITATIONS

Defendants make these disclosures based on the information presently known to them at this time. Defendants have not yet completed searches of their files for discoverable information that Defendants may use to support their defenses or otherwise relating to the claims and defenses at issue in this proceeding. Moreover, Defendants' investigation into the claims and defenses in this proceeding is ongoing. Therefore, Defendants reserve the right to supplement, amend, modify, or alter these initial disclosures as new information becomes available. These disclosures represent a good-faith effort to identify information that Defendants reasonably believe may be used to support one or more of their various defenses.

By making the following disclosures, Defendants do not represent (i) that any individual or entity identified herein necessarily possesses any discoverable or relevant information or documents; or (ii) that they are identifying every document, tangible thing, or witness they may use to support their defenses. Defendants reserve the right to call any witness, including the right to identify expert witnesses, or present any exhibit or item at trial not listed herein but determined through discovery, investigation, or otherwise to support their defenses.

By making these initial disclosures, Defendants do not waive their right to object to discovery of any information on the grounds of the attorney-client privilege, work-product doctrine, or any other applicable privilege or immunity. Nor do Defendants waive their rights to assert any objection authorized by the Federal Rules of Civil Procedure or any other applicable law in response to interrogatories, requests for admission, requests for production of documents, questions at depositions, or any other discovery requests involving or relating to the subject matter of these disclosures, including discovery directed at any of the individuals, entities, or documents identified in these disclosures. All the disclosures set forth below are made subject to the above general objections and limitations.

INITIAL DISCLOSURES

I. FED. R. CIV. P. 26(A)(1)(A)(I)

[T]he name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

A. Plaintiffs

Defendants identify the following individuals (exclusive of expert witnesses) as likely to have discoverable information that Defendants may use to support their defenses, including, but not limited to, the acquisition of ELA tokens during the Class Period.

Name	Address & Telephone Number
Mark Owen	c/o Bleichmar Fonti & Auld LLP 7 Times Square, 27th Floor New York, New York 10036 (212) 789-1340
James Wandling	c/o Bleichmar Fonti & Auld LLP 7 Times Square, 27th Floor New York, New York 10036 (212) 789-1340

B. Defendants

Defendants identify the following individuals (exclusive of expert witnesses) as likely to have discoverable information that Defendants may use to support their defenses, including, but not limited to: (i) the origins and development of the Elastos technology; (ii) the 2018 ELA token initial coin offering; (iii) Elastos's public statements, (iv) the Elastos token lock-in program, (v) Elastos's contacts with prospective or actual purchasers of Elastos tokens.

Name	Address & Telephone Number
Elastos Foundation	c/o Kenneth Herzinger Paul Hastings LLP 101 California Street Forty-Eighth Floor San Francisco, California 94111 (415) 856-7000
Feng Han	c/o Kenneth Herzinger Paul Hastings LLP 101 California Street Forty-Eighth Floor San Francisco, California 94111 (415) 856-7000
Rong Chen	c/o Kenneth Herzinger Paul Hastings LLP 101 California Street Forty-Eighth Floor San Francisco, California 94111 (415) 856-7000
Ben Lee	c/o Kenneth Herzinger

Name	Address & Telephone Number
	Paul Hastings LLP 101 California Street Forty-Eighth Floor San Francisco, California 94111 (415) 856-7000

C. Third Parties

Defendants identify the following third parties as likely to have discoverable information that Defendants may use to support their defenses. On information and belief, individuals employed or formerly employed by third parties may have discoverable information that Defendants may use to support their defenses in this action. Defendants cannot more specifically identify such persons without further discovery. To the extent Defendants learn the identities of these individuals, Defendants reserve the right to supplement these initial disclosures and shall do so as required by Federal Rule of Civil Procedure 26(e). Defendants have not yet identified experts expected to testify at a trial of this proceeding. Defendants reserve the right to identify experts and disclose their respective opinions at a later date

Third Party	Address & Telephone Number
Donnie Bullers	Unknown
Simon Cai	Unknown
Hao Cheng	Unknown
Dinghe Hu	Unknown
Hongjie Hu	Unknown
Wilson Lee	
Leo Lei	Unknown
Fay Li	Unknown
Clarence Liu	Unknown
Song Sjun	Unknown
Yipeng Su	Unknown
Zach Warsavage	Unknown

Third Party	Address & Telephone Number
Nan Yu	Unknown
May Yuan	Unknown
Kevin Zhang	Unknown
Julie Zhu	Unknown
Rebecca Zhu	Unknown
Bittrex Global	Bittrex Incorporated 701 5th Ave Ste. 4200 Seattle, WA 98104-3100
CoinEx	Unknown
CyberRepublic DAO	N/A
The Elastos Community	Unknown
Elk Insights LLC	Unknown
Huobi Global	Unknown
Kucoin	Unknown
Project ICO	Unknown
SimpleSwap	Unknown
Socure	Unknown
StealthEX	Unknown
Tokswap	Unknown
Uniswap	Unknown

II. FED. R. CIV. P. 26(A)(1)(A)(II)

[A] copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

At this time, Defendants have not yet completed searches of their files for discoverable information. Moreover, Defendants’ investigation into the claims and defenses in this proceeding is ongoing. Defendants nonetheless identify preliminarily the following categories of documents without admitting any such documents exist. Defendants will produce documents as

required by the Federal Rules of Civil Procedure and the Court's Orders and will meet and confer with Plaintiff accordingly.

- a) Documents relating to the origins and development of the Elastos technology.
- b) Documents relating to the Elastos 2018 ICO.
- c) Documents relating to the Elastos's token lock-in program.
- d) Documents relating to Elastos's public statements.
- e) Documents relating to Elastos's contacts with prospective or actual purchasers of Elastos Tokens.

III. FED. R. CIV. P. 26(A)(1)(A)(III)

[A] computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing the nature and extent of injuries suffered.

Not applicable.

IV. FED. R. CIV. P. 26(A)(1)(A)(IV)

[F]or inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable. Defendants do not have any insurance coverage for this matter or any insurance policies subject to disclosure under Fed. R. Civ. P. 26(a)(1)(A)(iv).

[Remainder of page intentionally left blank.]

Dated: February 1, 2022

By: /s/ Kenneth P. Herzinger

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CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2022, I served a copy of Defendants' Initial Disclosure Statement to All Plaintiffs via electronic email upon the following counsel for plaintiffs:

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Dated: February 1, 2022

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